

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JESSICA BERRYHILL, et al.,)	CASE NO: 5:19-cv-02504-JRA
)	
Plaintiff,)	JUDGE JOHN R. ADAMS
)	
v.)	MAGISTRATE CARMEN E.
)	HENDERSON
B&I HOTEL MANAGEMENT, LLC,)	
)	
Defendant.)	
)	

**PROPOSED STIPULATED ORDER REGARDING PLAINTIFF’S MOTION FOR
CONDITIONAL CERTIFICATION AND COURT-AUTHORIZED NOTICE**

Plaintiff Jessica Berryhill (“Plaintiff”) and Defendant B&I Hotel Management, Inc. (“Defendant”) (collectively the “Parties”), hereby submit this proposed stipulated Order memorializing their agreement.

This matter came on to be heard upon the *Plaintiff’s Motion for Conditional Certification and Court-Authorized Notice* (ECF No. 30) (the “Motion”). The Parties have discussed the issue of the conditional class sought in the Motion and have stipulated to the following class definition:

**All hourly employees employed at the Bertram Inn &
Conference Center at any time during the three years preceding
the commencement of this action.**

(the “Conditional Class”).

The Parties are to discuss the terms of the notice to be sent to members of the Conditional Class in an effort to reach an agreement on those terms in the next 14 days. If no agreement can

be reached, the Parties will submit their own Proposed Notices to the Court for consideration within 14 days.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Conditional Class is conditionally certified pursuant to 29 U.S.C. § 216(b) and that the Parties have 14 days to submit a stipulated notice or alternative proposed notice to the Conditional Class members to the Court.

IT IS HEREBY ORDERED.

JUDGE JOHN R. ADAMS

Dated: September 10, 2021

Respectfully submitted,

/s/ Joshua B. Fuchs

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of September, 2021, a copy of the foregoing was served electronically on all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Mark S. Fusco
One of the Attorneys for Defendant